

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DORA DAVIS,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION NO.:2:05-cv-1040-WKW
)	
ALBANY INTERNATIONAL,)	JURY DEMAND
JEFF JOHNSTON,)	
)	
Defendant.)	

MOTION FOR LEAVE TO AMEND COMPLAINT

COMES NOW, the Plaintiff, Dora Davis, pursuant to Rule 15(a), Fed.R.Civ.P., and Section Four of the Court's Uniform Scheduling Order dated January 24, 2006, and move this Court for leave to amend the Complaint. As grounds, show unto the Court as follows:

1. On October 28, 2005, the Plaintiff filed the present suit. The Defendants filed their answers on December 1, 2005. The Defendants also filed an Amended Answer on December 2, 2005.
2. Plaintiff therefore request leave to file the attached Amended Complaint asserting the Defendants violated ERISA, 29 USC §§ 1001 *et seq.*
3. Plaintiff further show unto Court that pursuant to Rule 15, Fed.R.Civ.P., leave to amend should be freely granted and that this request for leave to amend is timely in accordance with Section Four of the Court's Uniform Scheduling Order dated January 24, 2006.

WHEREFORE, THESE PREMISES CONSIDERED, Plaintiff respectfully request that this Court grant her leave to file the attached Amended Complaint, and further requests that

the Court award them any other relief to which they may be entitled.

Respectfully submitted this the 29th day of March, 2006.

/s/ Trina S. Williams
TRINA S. WILLIAMS (SAN 046)

/s/ Vicky U. Toles
VICKY U. TOLES (UND 014)

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing motion on this 29th day of March, 2006 upon the following:

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ**
Honorable Charles Powell IV
A Professional Corporation
420 North 20th Street, Suite 1600
Birmingham, Alabama 35203-5202

/s/ Trina S. Williams
TRINA S. WILLIAMS (SAN 046)